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Attorneys for Defendant Technicolor SA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

No. 07-cv-5944-SC
MDL No. 1917

This Document Relates to:

*Electrograph Systems, Inc., et al. v. Technicolor
SA, et al., No. 13-cv-05724;*

*Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Technicolor
SA, et al., No. 13-cv-00141;*

*Best Buy Co., Inc., et al. v. Technicolor SA, et
al., No. 13-cv-05264;*

**DECLARATION OF JEFFREY S.
ROBERTS IN SUPPORT OF THOMSON
SA'S ADMINISTRATIVE MOTION TO
FILE PORTIONS OF ITS REPLY IN
SUPPORT OF ITS MOTION TO DISMISS
DAPS' NEWLY FILED COMPLAINTS
UNDER SEAL**

1 *Interbond Corporation of America v.*
2 *Technicolor SA, et al., No. 13-cv-05727;*
3 *Office Depot, Inc. v. Technicolor SA, et al., No.*
4 *13-cv-05726;*
5 *Costco Wholesale Corporation v. Technicolor*
6 *SA, et al., No. 13-cv-05723;*
7 *P.C. Richard & Son Long Island Corporation,*
8 *et al. v. Technicolor SA, et al., No. 31:cv-*
9 *05725;*
10 *Schultze Agency Services, LLC, o/b/o Tweeter*
11 *Opco, LLC, et al. v. Technicolor SA, Ltd., et al.,*
12 *No. 13-cv-05668;*
13 *Sears, Roebuck and Co. and Kmart Corp. v.*
14 *Technicolor SA, No. 3:13-cv-05262;*
15 *Target Corp. v. Technicolor SA, et al., No. 13-*
16 *cv-05686*

1 I, Jeffrey S. Roberts, declare and states as follows:

2 1. I make this declaration in support of Thomson SA's (n/k/a Technicolor SA)
3 Administrative Motion to File Portions of its Reply in Support of Its Motion to Dismiss Newly
4 Filed Direct Action Plaintiffs' ("DAPs") Complaints Under Seal ("Motion to Seal"). The
5 statements contained in this declaration are based on my personal knowledge and, if called as a
6 witness, I could competently testify to the following facts.

7 2. I am currently an attorney with the law firm Faegre Baker Daniels LLP, counsel
8 for Defendants, Technicolor SA (f/k/a Thomson SA) and Technicolor USA, Inc. (f/k/a Thomson
9 Consumer Electronics, Inc.). I am admitted to practice *pro hac vice* before the United States
10 District Court for the Northern District of California.

11 3. Thomson SA's concurrently filed Reply discusses and/or references Exhibits A
12 through D and F through H to DAPs' Opposition to Thomson SA's Motion to Dismiss
13 ("Opposition"), exhibits that were previously filed under seal because they refer to, contain,
14 and/or reflect excerpts of documents and testimony that have been designated as "Confidential"
15 or "Highly Confidential" by other parties in this action under the terms of the Stipulated
16 Protective Order entered in this case. Accordingly, the undersigned believes good cause exists to
17 seal the portions of Thomson SA's Reply that discuss and/or reference these exhibits.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct.

20 DATED: February 18, 2014 at Denver, Colorado.

21
22 /s/ Jeffrey S. Roberts

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